

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Advanced Television Systems
and Their Impact Upon the
Existing Television Broadcast
Service

MM Docket No. 87-268

TO: The Commission

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**VENTURE TECHNOLOGIES GROUP'S COMMENTS
ON THE DIGITAL TELEVISION STANDARDS AGREEMENT**

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These comments on the Digital Television Standards Agreement (FCC 96-445, released November 27, 1996) proposed to the Commission and the Fifth Further Notice of Proposed Rule Making, upon which the issues it addresses were raised, are submitted on behalf of Venture Technologies Group and its associated broadcasting, cable companies, Internet service provider companies,¹ and clients, including full-service television broadcasters, low power television broadcasters, noncommercial television broadcasting companies, cable television multisystem operators, and cable television programmers (“VenTech”).² VenTech has forged this consensus from different industries in order to aid in the process for upgrading the public's full service and low power broadcast television service while using the spectrum most effectively.

I. INTRODUCTION.

On November 27, 1996, the Broadcast Caucus, the Consumer Electronics Manufacturers Association, and the Computer Industry Coalition on Advanced Television Service (“CICATS”) reached an agreement on a proposed advanced television technical

¹ Since its filing in response to the Sixth Notice of Proposed Rulemaking in this matter, VenTech has added The Loop Internet Switch Company, LLC, a regional ISP based in Los Angeles, to the companies upon whose behalf these comments are filed.

² For ease of reference, these comments refer to signatories as “VenTech,” which represents and is a signatory of this document on behalf of Venture Technologies Group, associated companies and clients, who are television broadcasters, cable television multisystem operators, and low power television station, including W54BQ, channel 54, Providence, Rhode Island; WBTL-LP, channel 5, Toledo, Ohio; W69CL, channel 69, Hartford, Connecticut; KPHZ-LP, channel 58, Phoenix, Arizona; KNET-LP, channel 38, Los Angeles, California; WBPA-LP, channel 29, Pittsburgh, Pennsylvania; WHTV, channel 18, Jackson, Michigan; KSFV-LP, channel 24, San Fernando Valley, California; KTAZ-LP, channel 25, Tucson, Arizona; K31CK, channel 31, Tucson, Arizona; WTWB-TV, channel 19, Johnstown, Pennsylvania; K38DY, channel 38, Calabasas, California; K69HJ, channel 69, Phoenix, Arizona; W30BH, Birmingham, Alabama; KBCB, Bellingham, Washington; On-Line Public Educational Network for the 21st Century, Inc., an applicant for several noncommercial television construction permits, CalaVision Cable, Los Angeles, California, and The Loop Internet Switch Company, LLC, a regional ISP. These comments represent the consensus of the signatories but all signatories may not subscribe to each point.

standard. The Commission is seeking comments on the elements of the ATSC digital television standard..

II. THE DTV STANDARD SHOULD REMAIN OPEN TO INNOVATIONS.

The CICATS proposal for ATV used technology from DemoGraFX to enable the transmission of 1024 line, 2:1 wide-screen aspect ratio, progressive scan, 72 Hz frame rate picture. The proposed Digital Television Standard Agreement is not capable of transmitting a 1,080 line 60 Hz progressive line picture. The technology developed by DemoGraFX used to accomplish the transmission of a progressive scan picture with over 1,000 lines is also capable of transmitting a 1,080 line 60 Hz progressive picture within the proposed Digital Television Standard 19 MBIT transmission stream. This capability should be incorporated into the Digital Television Standard.

More importantly, the DemoGraFX technical capabilities should be used as an example of additional development in digital video coding since the original Grand Alliance proposal several years ago. In accord with the Digital Television Standard Agreement, it is important that the ATV standard remain flexible for upgrades as the technology advances.

The Commission should model its technical parameters in a manner that allows for not just for future growth and evolution, but for radical growth and revolution. Moore's Law states that the computer industry doubles its speeds and capacities every 18 months. The Commission should not block this growth with an inflexible standard.

Finally, the Commission should use the compromise executed by the parties to the Digital Television Standard Agreement to forge similar agreements between the full-service television broadcasters, the low power television broadcasters and other parties.

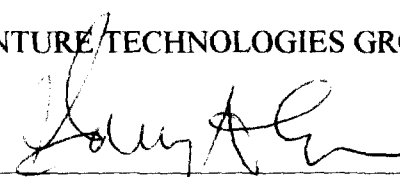
III. CONCLUSION.

For the reasons specified herein, Venture Technologies Group, on behalf of itself and its associated companies and clients, respectfully requests that the Federal Communications Commission incorporate the comments contained herein in its Rulemaking regarding Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service. The model forged by parties in the Digital Television Standard Agreement should be a model used to preserve low power television in the ATV universe and allow for future technical innovations.

Respectfully submitted,

VENTURE TECHNOLOGIES GROUP

By


Garry Spire, Esq.
General Counsel

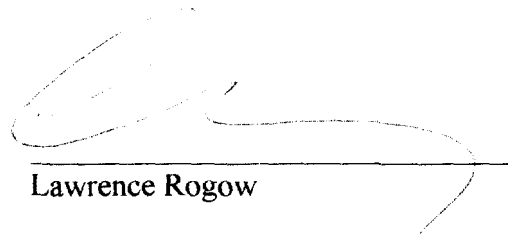
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December 5, 1996

Certificate of Service

I, Lawrence Rogow, hereby certify that on this 5th day of December 1996, I have caused an original and nine copies of the foregoing Venture Technologies Group's Comments on the Sixth Notice of Proposed Rulemaking to be mailed via Federal Express to the offices of the following:

Mr. William Caton
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554



Lawrence Rogow